

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	Chapter 15
 PB LIFE AND ANNUITY CO., LTD., et al.	 Case No. 20-12791 (LGB)
 Debtors in Foreign Proceeding.	 (Jointly Administered)
 UNIVERSAL LIFE INSURANCE COMPANY,	 Adv. Proc. No. 21-01169
 Plaintiff,	
 v.	
 GLOBAL GROWTH HOLDINGS, INC., et al.,	
 Defendants.	

NOTICE OF MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT

PLEASE TAKE NOTICE that on November 9, 2021, or as soon thereafter as the Court may allow, the undersigned counsel for Defendants Atlantic Coast Life Insurance Company and Sentinel Security Life Insurance Company (“Movants”) shall move before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York, for entry of an Order granting dismissal of Plaintiff Universal Life

Insurance Company's adversary complaint pursuant to Rule 9(b), 12(b)(1), 12(b)(2), and 12(b)(6), of the Federal Rules of Civil Procedure, and any further relief as may be deemed just and proper.

PLEASE TAKE FURTHER NOTICE that the Movants will rely upon the Memorandum of Law in Support of their Motion to Dismiss, filed contemporaneously with this Notice of Motion.

PLEASE TAKE FURTHER NOTICE that due to the COVID-19 pandemic and in accordance with the Court's General Order M-543, dated March 20, 2020, the hearing will only be conducted telephonically. Parties should not appear in person and those wishing to participate in the hearing must make arrangements through Court Solutions, LLC. Instructions to register for Court Solutions, LLC are attached to the Court's General Order M-543.

PLEASE TAKE FURTHER NOTICE that pursuant to the Stipulation and Order Further Extending Time to Answer and Move to Dismiss [ECF No. 52], answering papers, if any, containing objections, shall be filed with the Clerk of the Court and served upon the undersigned counsel so as to be received by November 8, 2021. Any Reply by the Movants shall be filed with the Clerk of the Court and served upon Plaintiff so as to be received by November 29, 2021.

Dated this 11th day of October, 2021.

Respectfully submitted,

CARLTON FIELDS, P.A.

/s/ Luis E. Orengo, Jr.

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Company and Sentinel Security Life Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the clerk of Court using the CM/ECF system which will send electronic notification of such filing to all other parties who have filed a notice of appearance.

Signed this the 11th day of October 2021.

/s/ Luis E. Orengo, Jr.
Luis E. Orengo, Jr.